

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DAVID HOUSE, )  
Plaintiff, )  
v. )  
JANET NAPOLITANO, in her official capacity as )  
Secretary of the U.S. Department of Homeland )  
Security; ALAN BERSIN, in his official capacity as )  
Commissioner, U.S. Customs and Border Protection; )  
JOHN T. MORTON, in his official capacity as Director, )  
U.S. Immigration and Customs Enforcement, )  
Defendants. )  
Case No. 1:11-cv-10852-DJC

## JOINT MOTION FOR CONTINUANCE

A status conference in this matter is currently scheduled for Monday, March 18, 2013 at 2:00 p.m. The parties jointly request at least a 30-day continuance of the status conference. In support of this request, counsel for the parties represent that the parties have been engaged in active settlement talks and both sides believe that a settlement in this case is probable. However, additional time is needed to work out the details and get the necessary approvals to finalize the settlement. In the alternative, the parties request to participate in the status conference by telephone.

Dated: March 13, 2013

Respectfully Submitted,

## AMERICAN CIVIL LIBERTIES UNION

U.S. DEPARTMENT OF JUSTICE  
STUART F. DELERY  
Principal Deputy Assistant Attorney General

DIANE KELLEHER  
Assistant Branch Director

By: /s/ Catherine Crump  
Catherine Crump  
ccrump@aclu.org  
Speech, Privacy and Technology Project  
125 Broad Street, 17<sup>th</sup> floor  
New York, New York 10004  
(212) 549-2500

John Reinstein, BBO # 416120  
jreinstein@aclum.org  
American Civil Liberties Union  
of Massachusetts  
211 Congress Street  
Boston, Massachusetts 02110  
(617) 482-3170

By: /s/ Marsha Stelson Edney  
Marsha Stelson Edney  
Senior Trial Counsel  
U.S. Department of Justice, Civil Division  
Federal Programs Branch  
20 Massachusetts Ave., N.W., Room 7148  
Washington, D.C. 20530  
Tel.: (202) 514-4520  
Fax.: (202) 616-8470

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DAVID HOUSE, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 ) Case No. 1:11-cv-10852-DJC  
 JANET NAPOLITANO, in her official capacity as )  
 Secretary of the U.S. Department of Homeland )  
 Security; ALAN BERSIN, in his official capacity as )  
 Commissioner, U.S. Customs and Border Protection; )  
 JOHN T. MORTON, in his official capacity as Director, )  
 U.S. Immigration and Customs Enforcement, )  
 )  
 Defendants. )  
 )

**[PROPOSED] ORDER**

Upon consideration of the parties' joint motion for continuance and good cause having  
been shown, it is hereby ORDERED that the motion is granted and the status conference is  
hereby continued to April \_\_\_\_, 2013.

Dated: \_\_\_\_\_, 2013

---

HONORABLE DENISE J. CASPER  
UNITED STATES DISTRICT JUDGE

**CERTIFICATION OF SERVICE**

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants by First Class Mail, on the 13th of March, 2013.

*/s/Marsha Stelson Edney*  
MARSHA STELSON EDNEY  
March 13, 2013